

***Connors v. DHMC et al***  
***Case No. 2:10-cv-94***

**Exhibit 1**



Jennifer Meagher &lt;j.meagher.wattslawfirmpc@gmail.com&gt;

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**CONNORS/DHMC**

2 messages

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**Norman Watts Esq** <nwatts@wattslawfirmpc.us>

Thu, Mar 24, 2011 at 9:23 AM

To: Edward Kaplan &lt;ekaplan@suloway.com&gt;

Cc: Jennifer Meagher &lt;j.meagher.wattslawfirmpc@gmail.com&gt;

Ed - Please give me some feedback regarding the proposed witness list I sent you so that we can schedule them and/or request an exception from the court. Scheduling is currently stalled.

Thanks.

NW

**WATTS LAW FIRM PC**

**Norman E. Watts, Esq.**

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**Edward Kaplan** <ekaplan@suloway.com>

Thu, Mar 24, 2011 at 2:23 PM

To: Norman Watts Esq &lt;nwatts@wattslawfirmpc.us&gt;

Cc: Jennifer Meagher &lt;j.meagher.wattslawfirmpc@gmail.com&gt;

You will need to file with the Court and I will react accordingly. In anticipation of your question, I do not assent to the relief you will seek in any such motion as I believe "enough is enough."

Edward M. Kaplan, Esquire  
Suloway & Hollis, PLLC  
9 Capitol St., PO Box 1256, Concord, NH 03302-1256

Phone: 603-223-2863 Fax: 603-224-2557  
E-Mail: ekaplan@sulloway.com

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Jennifer Meagher <j.meagher.wattslawfirmpc@gmail.com>

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## CONNORS/DHMC WITNESSES

1 message

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**Norman Watts Esq** <nwatts@wattslawfirmpc.us>

Tue, Mar 22, 2011 at 3:02 PM

To: Edward Kaplan <ekaplan@suloway.com>

Cc: Jennifer Meagher <j.meagher.wattslawfirmpc@gmail.com>

Ed - Attached is the list of DHMC witnesses I would like to depose. Obviously, we need more dates than we have currently reserved for these and the VA witnesses.

NW

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**CONNORS.DHMC.WITNESS.LIST.pdf**

751K

<b>CONNORS v DHMC et al</b> <b>PLAINTIFF'S WITNESS LIST</b> <b>3/14/11</b>		
<b>Witnesses</b>	<b>Relationship to Claims</b>	<b>Other Considerations</b>
Bonacci, David, MD	JC NHH mentor, supervisor	Advised JC re her standing
Carboneau, Kimberly, Esq.	ODS; JC consultations re complaints, ADHD, FFD	
Corson, John, MD	JC psychotherapy supervisor @ VA; DCF issus	Long email per LL 11/17/08 email
Donnelly, Craig, MD	PGY 2 & 3 - child clinic	JC discussions re fellowship & his evaluation
Donnelly, Craig, MD	JC PGY3 supervisor	
Ferrell, Richard, MD	NHH supervisor; disc w/RG re JC performance, status	
Finn, Christine, MD	DHMC residency assoc. dir. during JC residency; supervised JC during consult month	
Foster, Tina, MD	Assoc. Dir. GME; ACGME committee	Numerous discussions w/JC & others re: VA office assignments, etc
Gillock, Karen, PdD	JC Psychotherapy DHPA supervisor	Opined about complaints vs JC, made referral to Platt @ EAP
Green, Ronald, MD	Residency program director; Plaintiff's supervisor	Hired, fired plaintiff
Green, Alan, MD	Chair, DHMC psych dept; involved in evals, discharge	Numerous discussions w/JC & others re: same
Hu, Da-Shi, MD	DHMC; expressed complained re JC	

<b>CONNORS v DHMC et al</b> <b>PLAINTIFF'S WITNESS LIST</b> <b>3/14/11</b>		
King, Michelle	DHMC ODS official	Involved with Landon, Carboneau in JC personnel issues; disc w/JC re her complaints
Koury, Sara	DHMC EAP official; dealt with Fitness for Duty Evaluation ("FFD") & JC return to work '07 - '08	Numerous meetings w/JC & others re: same
Levin, Morris, MD	DHMC; JC attending MD for neurology	Involved in "AWOL" issue
Silberfarb, Peter, MD	JC DHPA supervisor in lieu of RG	Wrote recommendation
Smiga, Susan, MD	JC PGY3 supervisor	
Trietley, Kalindi	College LD office; Lengthy discussions re JC accommodations, situation	
Walsh, Sara, MD	Former DHPA resident	Worked w/JC; observed her on duty
West, Donald, MD	JC DHMC supervisor PGY2 until admin leave	See evaluations; discussions re accommodations